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Of Attorneys for Plaintiff

Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

RJ WYLD LLC, a Wyoming limited liability
company,

Plaintiff and Counterclaim Defendant,

v.

WYLD ADVENTURES LLC, a Wyoming
limited liability company,

Defendant and Counterclaim Plaintiff.

Civil Case No. 24-CV-00186-KHR

AFFIDAVIT OF ANGLIA LEIDING

ANGLIA LEIDING, being duly sworn, deposes and says:

1. My name is Anglia Leiding and I reside in Sheridan, Wyoming.
2. I have been a customer of Wyld 'n Pretty, a boutique shop located in downtown Sheridan, since approximately 2020.
3. I have also been a customer of WYLD Adventures, another boutique shop in downtown Sheridan, since it opened in approximately 2022.
4. When WYLD Adventures first opened on the main street, near Wyld 'n Pretty's storefront, I found the similarity in names confusing. Others in the community also expressed confusion to me due to the identical spelling of "Wyld" in both business names.

5. Curious about WYLD Adventure's offerings, I visited the store shortly after it opened. While browsing, I noticed a children's product line featuring the word "Wyld" on a hat, which caught my attention. I purchased one for my grandson. While paying, I asked the store owner about the product line, which they referred to as their "Wyld Child" line. I mentioned that the branding closely resembled the products at Wyld 'n Pretty and inquired about its origin. The owner, Ms. Rathjen, explained that she created the line because she had small children who were "wild" and wanted to build a product line around that concept. Attached as **Exhibit A** is an image of the hat referenced in this paragraph.

6. After this encounter, I informed the owner of Wyld 'n Pretty that WYLD Adventures was selling a product similar to her Wyld-branded apparel. I have purchased Wyld-branded products for my children and grandchildren over the years and have always valued the distinctive and creative design of Wyld 'n Pretty's merchandise.

7. The holiday season is a particularly busy time in Sheridan. The day after Thanksgiving, the town hosts an annual event called the Christmas Stroll, during which the downtown shopping area is closed to vehicle traffic, allowing hundreds of shoppers to visit local boutique shops. Both Wyld 'n Pretty and WYLD Adventures are located within this designated shopping area. Like many in the community, I enjoy supporting local businesses and finding unique gifts during this event.

8. During the most recent holiday season, I intended to purchase another "Wyld Child" hat and browse WYLD Adventure's new product offerings. My husband and I entered WYLD Adventures, but I could not find the "Wyld Child" hats on display. However, we both noticed them behind the checkout counter. My husband saw the hats and asked me if WYLD Adventures was now selling Rockie's products from Wyld 'n Pretty. I informed him that they were not associated with Rockie. I then asked the store owner, Mr. Rathjen, if I could purchase a "Wyld Child" hat, and he responded that they had removed the product from shelves because it was "too similar to another store's products and that he did not want to be fined \$5,000." I found this statement confusing and asked if he was referring to my friend Rockie from Wyld 'n Pretty. At

that point, he changed the subject and refused to discuss the “Wyld Child” product line further. However, approximately one month later I visited the WYLD Adventures website, and I saw that WYLD Adventures was still selling “Wyld Child” hats online. Attached as **Exhibit B** is a screenshot of the product listing from the WYLD Adventure’s website.

9. Over the past year, I have spoken with several Sheridan residents who, like my husband, mistakenly believe that WYLD Adventures is selling Rockies’s branded products in their store. Although this is not the case, the similarity in branding is misleading, as WYLD Adventure’s products prominently feature the distinctive “Wyld” name.

10. Another peak shopping season in Sheridan occurs during the summer rodeo season, when thousands of visitors come to town. Locals typically shop in advance to avoid inventory shortages, as products tend to sell out quickly during this time. Wyld ‘n Pretty specializes in western-themed products, and I have observed that rodeo season is particularly busy for the store. However, I have also noticed that WYLD Adventures has begun selling similar western-themed merchandise featuring the word “Wyld”. At this point, there is no clear way to distinguish whether someone wearing Wyld-branded apparel purchased it from Wyld ‘n Pretty or WYLD Adventures.

11. Over the past two years, I have verbally communicated my concerns about customer confusion to Rockie on multiple occasions.

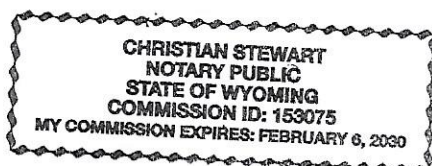
Dated this 30 day of January, 2025.



Anglia Leiding, Affiant

STATE OF WYOMING)
) ss
COUNTY OF SHERIDAN)

The foregoing Affidavit was subscribed and sworn to before me on January 30, 2025, by Anglia Leiding.

WITNESS my hand and official seal.
My commission expires: 02/06/2030




Notary Public